

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,  
LI MINJUN,  
TU LAN,  
ZHU FENG,  
also known as "Johnny Zhu,"  
KUANG ZEBIN,  
also known as "Vincent Kuang,"  
MICHAEL MCMAHON,  
ZHAI YONGQIANG,  
ZHENG CONGYING and  
ZHU YONG,  
also known as "Jason Zhu,"  
Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

*Filed Electronically*

**CERTIFICATION OF  
MICHAEL T. MCMAHON**

I, **MICHAEL T. McMAHON**, being of full age, do hereby certify under penalty of perjury that the following facts are true:

1. My father is the Defendant Michael McMahon.
2. On or about October 28, 2020, at approximately 6:00 A.M., I woke up to the sound of banging at the front door of my family's home in Mahwah, New Jersey. As I walked up the stairs, I saw flashlights through the front door.
3. When my father opened the front door, the FBI Agents stated: "Michael McMahon you're under arrest." My father asked "Junior?" In response, the FBI Agents confirmed that they were looking for my father, not me, since we have the same name.

4. After coming up the stairs, I sat on the couch in the living room facing the front door, which is approximately ten (10) feet away from the entrance. While I was sitting on the couch across from the front door, I heard my father ask the FBI Agents: "Is this about Paul Bergrin?" It is my impression that the question caught the FBI Agent that my father was speaking to off guard and it was apparent that the question hit a nerve. In response, the FBI Agent shook his head, looked at my father with a smirk, and stated: "You've been on my board more than once."

5. I found this statement upsetting to hear, so when my mother, Mary Martha McMahon, walked towards me I said, "Did you hear what he said?," to which my mother replied: "What did he say?" I told my mother: "They just said to dad, 'You've been on my board more than once.'"

6. At that point, my mother sat on the couch across from me as my father was taken down the hallway to his bedroom. Upon my father's return, the FBI Agents escorted my dad out of the front door without handcuffs.

I swear and subscribe to the foregoing statements made. I understand that if any of the foregoing statements made are false, I am subject to the penalty of perjury.

Date: August 8, 2022

  
Michael T. McMahon